

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

SKAT TAX REFUND SCHEME LITIGATION

This document relates to: 1:21-cv-05339-LAK

18-MD-2865 (LAK)

ECF Case

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the deadline for Defendant Michael Ben-Jacob to answer or file a motion in response to the Complaint filed by Plaintiff Skatteforvaltningen in the above-captioned case is hereby extended up to and including September 10, 2021.

No provision of this Stipulation and Order shall be construed as a waiver of, and Defendant expressly reserves, any and all defenses.

This is Defendant's first request for an extension of time to answer or otherwise respond to the Complaint.

Dated: July 13, 2021
New York, New York

T D J

Thomas E.L. Dewey
DEWEY PEGNO & KRAMARSKY LLP
777 Third Avenue – 37th Floor
New York, New York 10017
(212) 943-9000
tdewey@dpklaw.com

*Attorneys for Defendant
Michael Ben-Jacob*

/s/ John T. McGoey
(e-signed with consent)

John T. McGoey
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, NY 10004
(212) 837-6000
john.mcgoey@hugheshubbard.com

*Attorneys for Plaintiff
Skatteforvaltningen*

SO ORDERED:

/s/ Lewis A. Kaplan /BT 07/14/2021

Hon. Lewis A. Kaplan
United States District Judge